

October 14, 2022

VIA ELECTRONIC FILING

The Honorable George C. Hanks, Jr.
United States District Judge
Southern District of Texas
515 Rusk St., Room 6202
Houston, TX 77002

Re: 4:20-cv-01802, *Arnold et al v. Barbers Hill Independent School District et al*

Dear Judge Hanks:

Plaintiffs and BHISD (the “Parties”) submit this joint letter to inform the Court of all outstanding discovery matters. The following discovery matters have not been resolved.

- **Discovery Dispute Concerning the Sufficiency of the BHISD’s Privilege Log.** *See* Dkt. Nos. 186, 192.
- **Plaintiffs’ Subpoenas for Documents Directed to Individual Board Members Pursuant to Fed. R. Civ. P. 45.** *See* Dkt. Nos. 198, 200.
- **BHISD’s Motion to Quash the Deposition of Sara Leon and Plaintiffs’ Request to File a Sur-reply.** *See* Dkt. Nos. 204, 207, 222, 227.
- **Plaintiffs’ Motion to Compel Documents Evidencing the Origin of and Justification for the Challenged Policy’s Gender Discrimination.** *See* Dkt. Nos. 211, 215, 218. In its Response to Plaintiffs’ motion to compel, BHISD agreed to amend its interrogatory answers and has agreed to produce additional documents, including board minutes, memos, and policies on the Hair Policy from 1929 to present. Production is ongoing. As of this filing, Plaintiffs note that they have not received the original justification for the policy. Plaintiffs still seek an order compelling the District to provide specific discovery, witnesses, and information relating to the origin of and justifications for the Policy.
- **Search Terms.** The parties have met and conferred regarding the adequacy of Plaintiffs’ proposed search terms. Plaintiffs modified its search terms resulting in a new hit count of 9,604. Based on the new hit count, BHISD has agreed to review and produce all discoverable documents. The parties will continue to work together to resolve this matter without court intervention.

Respectfully Submitted,
/s/ Ashley M. Burrell

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